

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: STEPHANIE BROOKS-MANNING, : **CHAPTER 13**
: **DEBTOR(S).** : **CASE No.: 22-12815**

MOTION FOR PERMISSION TO APPROVE A LOAN MODIFICATION

Debtor, Stephanie Brooks-Manning, files the forgoing Motion for Permission to Approve a Loan Modification, and avers as follows:

1. Debtor filed her case on 10/20/2022.
2. Debtor owns property at 305 Bok Road, Wyncote, PA 19095. Flagstar Bank maintains a mortgage against the subject property.
3. The parties have a long litigation history and Debtor's Plan remains unconfirmed.
4. To resolve Debtor's Objection to lender's Proof of Claim No. 3, Lender's Objection to Confirmation, and Stipulation related to a Motion for Relief, the parties agreed to a loan modification.
5. Lender requires Court permission to complete the loan modification.
6. The loan modification is in the best interest of the Debtor, as the arrears will be capitalized. A copy of the loan modification is attached hereto as Exhibit "A".
7. The unsecured creditors will be paid 100%.
8. The plan was modified to reflect the modification.
9. Based on the above, Debtor requests permission.

WHEREFORE, Debtor requests that the attached order be granted.

Date: 8/12/24

Respectfully Submitted,

/s/ Michelle Lee
Michelle Lee, Esq.

Dilworth Paxson LLP
1500 Market Street, Ste. 3500E
Philadelphia, PA 19102